7.0 INCINERATOR PERFORMANCE

Incinerator performance is discussed in this section as required by 40 CFR 270.62(a). TOCDF believes that the conditions specified in Section 5.2 for the MPF STDT will be adequate to meet the performance standards of 40 CFR 264.343 while thermally treating spray tanks with \leq 22 pounds of Agent VX and 82.6 pounds of lead for the following reasons:

- The range of operating conditions planned for the MPF STDT are within the design envelope of the MPF and MPF PAS.
- Calculations shown in Appendix B show the diffusion of lead from the nose cone will be minimal. Lead emissions from the nose cone will be comparable to the emission rates used in the HHRA.
- Only one test comprised of three runs is required since the TOCDF MPF is operated as a steady state, batch feed incinerator. Temperatures are maintained within the limits established by the MPF VX ATB. Combustion air flow and velocity fluctuates as necessary to maintain the proper negative pressure in the furnace.
- The MPF and MPF PAS are tightly controlled by Programmable Logic Controllers (PLCs) and AWFCO systems whenever hazardous waste is being fed to the MPF.
- TOCDF experience with operation of the MPF under similar operating conditions suggests that the PM emissions will be less than the RCRA and DAQ performance standards.